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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

DWIGHT DOVE,

Plaintiff,

v.

BAYER HEALTHCARE, Biological Products
Division, a for profit business entity,

Defendant.

CASE NO. C-05-02873 JSW

**STIPULATION AND ~~/PROPOSED/~~
ORDER PROTECTING PARTIES'
CONFIDENTIAL INFORMATION AND
ALLEGED TRADE SECRETS**

Judge: Honorable Jeffrey S. White

Trial Date: None Set.

1 WHEREAS, on December 8, 2003, *Jones, et al. v. Bayer* was filed as a putative class
 2 action, with the named plaintiffs of Lavon Jones, Nathaniel Woods, Haben Berhane, and Dwight
 3 Dove;

4 WHEREAS, on November 22, 2004, the putative class action allegations were removed
 5 from the Jones et al. complaint when the plaintiffs filed their 2nd Amended Complaint;

6 WHEREAS, on June 2, 2005, defendant Bayer HealthCare along with plaintiffs Lavon
 7 Jones, Nathaniel Woods, Haben Berhane, and Dwight Dove entered into a Stipulation Protecting
 8 Parties' Confidential Information and Alleged Trade Secrets, pursuant to Rule 26(c)(7);

9 WHEREAS, on June 21, 2005, the Court "ORDERED that the Stipulation be adopted in its
 10 entirety...";

11 WHEREAS, Bayer's motion to sever was granted in the *Jones, et al.* matter by this Court
 12 on June 23, 2005. Plaintiff Dove filed his individual Complaint on July 14, 2005, based largely on
 13 the same individual allegations as the *Jones, et al.* suit. While no longer one suit, the individual
 14 actions continue to be deemed related;

15 WHEREAS, plaintiff, on the one hand, and Bayer, on the other hand, are collectively
 16 adverse, they agree through their respective counsel and stipulate as follows:

- 17 1. Dwight Dove and Bayer HealthCare do hereby re-adopt the Stipulation Protecting
 18 Parties' Confidential Information and Alleged Trade Secrets. A true and accurate
 19 copy of the Stipulation and Order is attached hereto as Exhibit A.
- 20 2. Both parties to this suit retain their duties and responsibilities as stipulated and
 21 ordered in the Stipulation Protecting Parties' Confidential Information and Alleged
 22 Trade Secrets.

23 **IT IS SO STIPULATED.**

24
 25 DATED: March 16, 2006

MOORE & MOORE

27 By: s/Howard Moore, Jr.
 28 HOWARD MOORE, JR.
 Attorney for Plaintiff
 DWIGHT DOVE

1 DATED: March 16, 2006

By: s/Charles Stephen Ralston
CHARLES STEPHEN RALSTON
Attorney for Plaintiff
DWIGHT DOVE

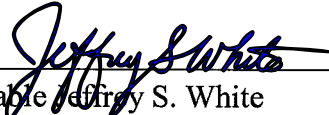
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4 DATED: March 16, 2006

THE LOUDERBACK LAW FIRM

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6 By: s/Stephen K. Robinson
JEROME SCHREIBSTEIN
JAMES T. CONLEY
STEPHEN K. ROBINSON
Attorneys for Defendant
BAYER HEALTHCARE LLC

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11 **IT IS SO ORDERED.**

12 Dated: March 16, 2006

13 
Honorable Jeffrey S. White
UNITED STATES DISTRICT JUDGE
NORTHERN DISTRICT OF CALIFORNIA

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15 Doc#: 37091